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Attorneys for Defendant Josef F. Boehm

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

SALLY C. PURSER,

Plaintiff,

v.

JOSEF F. BOEHM, ALLEN K.
BOLLING, LESLIE WILLIAMS,
JR., and BAMBI TYREE

Defendants.

Case No. 3:05-cv-00085 JKS

**MOTION TO EXTEND DATE TO CLOSE DISCOVERY FOR THE LIMITED
AND SOLE PURPOSE OF EXPERT EVALUATION**

Josef Boehm, defendant in this matter, through his counsel, the Kenner Law Firm and local counsel, the law firm of Wade, Kelly & Sullivan, respectfully requests the Court to allow extension of the deadline closing discovery in this case for the limited and Motion to Extend Time and Motion For Conference Purser v. Boehm No. 3:05-cv-00085 JKS

1 sole purpose of evaluation of the plaintiff, Sally Purser by defendant's expert Dr. Mark J.
2 Mills.

3 As grounds for this motion, the defendant states that the evaluation of Ms.
4 Purser was originally scheduled for June 25, 2007. All parties to the case, including the
5 medical experts, agreed to this date. Although Dr. Mills was available to evaluate Ms.
6 Purser prior to the date of the close of discovery, June 25, 2007, the defendant agreed to
7 extend the discovery date until June 25, 2007, on the Court's approval, as Dr. Rose was
8 not available prior to June 25, 2007 and he was to be present during Dr. Mills' evaluation
9 pursuant to Court's Order.
10

11 Ms. Purser and Dr. Rose were present in local counsel's office on June 25
12 2007. Although travel and lodging arrangements had been made for Dr. Mills and Dr.
13 Mills agreed to the June 25, 2007 date, Mr. Mills was not present on that date.
14

15 Mr. Jones, counsel for the plaintiff has been out of state the better part of
16 June, and upon information and belief, will be out of state until the first week of July.
17 Accordingly, he has been unavailable to discuss this development. On June 25, 2007 in
18 local counsel's office, Ms. Purser, Dr. Rose and Dr. Mills (by telephone) agreed to
19 reschedule Ms. Purser's evaluation for July 6, 2007.
20

21 Counsel for the defendant respectfully requests the Court to allow an
22 extension of the discovery deadline in this case for the sole purpose of evaluation of Ms.
23 Purser on July 6, 2007.

24 Motion to Extend Time and Motion
For Conference
Purser v. Boehm
25 No. 3:05-cv-00085 JKS

1 This motion is supported by affidavit of counsel and Dr. Mills, attached
2 herewith.

3 DATED this 28TH day of June, 2007 at Anchorage, Alaska.

4
5 WADE, KELLY & SULLIVAN

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25 **CERTIFICATE OF SERVICE**

I hereby certify that on June 28, 2007, a copy of the foregoing was served electronically on Darryl L. Jones, Esquire
For Conference

Purser v. Boehm
and by regular U.S. Mail on: Allen Bolling
No. 3:05-cv-00085 JKS

s/ Pamela Sullivan.